
TECHNICAL REVIEW DOCUMENT
For
MODIFICATION to OPERATING PERMIT 02OPPB249

Black Hills/Colorado Electric Utility Company, LP – Pueblo AIP Station
Pueblo County
Source ID 1010396

April 2013

Operating Permit Engineer:	Jayson Ellis
Operating Permit Supervisor review:	Matt S. Burgett
Field Services (or Oil & Gas) Unit review:	David Huber

I. Purpose

This document establishes the basis for decisions made regarding the requested modifications to the Operating Permit for the Pueblo AIP Station. This document provides information describing the type of modification and the changes made to the permit as requested by the source and the changes made due to the Division's analysis. This document is designed for reference during review of the proposed permit by EPA and for future reference by the Division to aid in any additional permit modifications at this facility. The conclusions made in this report are based on the information provided in the request for modification submitted to the Division on September 28, 2012. This narrative is intended only as an adjunct for the reviewer and has no legal standing.

Any revisions made to the underlying construction permits associated with this facility made in conjunction with the processing of this operating permit application have been reviewed in accordance with the requirements of Regulation No. 3, Part B, Construction Permits, and have been found to meet all applicable substantive and procedural requirements. This operating permit incorporates and shall be considered to be a combined construction/operating permit for any such revision, and the permittee shall be allowed to operate under the revised conditions upon issuance of this operating permit without applying for a revision to this permit or for an additional or revised Construction Permit.

II. Description of Source

This source is classified as an electric services facility under Standard Industrial Classification 4911. This facility consists of four identical diesel-powered internal combustion engines capable of generating a total of 10 MegaWatts (MW). Also located at the facility is a 200,000 gallon diesel fuel storage tank, which is listed in the permit as an insignificant activity, due to low emissions.

The four engines are General Motors, Diesel Fuel-Fired Internal Combustion Engines, Model No. MP-45, Each Rated at 29.52 MMBtu/hr and 3500 hp (Site Rated). Each unit is capable of generating 2.5 MW of electric power.

This facility is located at 475 William M. White Blvd, in Pueblo, CO. The site is about 1 and ½ miles west of the Pueblo Airport. This facility is located in an area that is designated as attainment for all criteria pollutants. There are no affected states within 50 miles of this facility. The Great Sand Dunes National Wilderness Area, a federal class I designated area, is within 100 km of this facility. The Great Sand Dunes National Monument, those portions not included as National Wilderness Areas, is federal land within 100 kilometers of the facility. This area has been designated by the State to have the same sulfur dioxide increment as federal Class I designated areas.

III. Description of Permit Modification Request/Modification Type

The operating permit for the Pueblo AIP Station was renewed on May 1, 2012. Black Hills/Colorado Electric Utility Co., LP submitted a request received September 28, 2012 to reduce CO permit limits with the addition of catalytic oxidation emission controls on all four engines. Emissions controls were added to comply with CFR Part 63 Subpart ZZZZ. The requested reduction of the CO permit limit matches the required reduction of CO emissions in CFR Part 63 Subpart ZZZZ.

Colorado Regulation No. 3, Part C, Section X.A identifies those modifications that can be processed under the minor permit modification procedures. Specifically, minor permit modifications “are not otherwise required by the Division to be processed as a significant modification” (Colorado Regulation No. 3, Part C, Section x.A.6). The requested changes will only decrease CO emission limits. Therefore, the Division agrees that this modification qualifies as a minor modification.

IV. Discussion of Modifications Made

The following modifications were made to the permit:

- Section I, Condition 6.1 – Updated table to reflect control devices
- Section II, Condition 1.1 – Reduced CO permit limit from 97.6 tons/yr to 29.3 tons/yr
- Section II, Condition 1.1 – Reduced CO Compliance Emission Factor from 1.4 lbs/MMBtu to 0.42 lbs/MMBtu
- Appendix F – added a description of the modifications made